

# Exhibit 3



Murphy, Falcon & Murphy is a singular collection of elite attorneys—an African-American-owned firm—founded in Baltimore City with a unique track record of successes with over \$700,000,000 million in verdicts and settlements in courts around the country, including a \$276,000,000 million verdict against a major national bank which included the largest punitive damages award in Maryland history at that time; a \$185,000,000 million settlement against Ernst & Young, the largest single-defendant settlement in Maryland history at that time; a multi-million dollar settlement on behalf of a young African American woman



injured in a school bus accident despite a \$100,000 cap on damages; \$55,000,000 million class action settlement on behalf of a community whose ground water had been contaminated by fly ash; and a \$50,000,000 million settlement on behalf of a class and individuals who had unnecessary stents implanted by Dr. Mark Midei.

Murphy, Falcon & Murphy prides itself in cultivating a group of attorneys who are diverse not only racially and ethnically, but also in terms of experiences within and outside of the law. Murphy, Falcon & Murphy's team includes a former trial judge, former prosecutors, law school professors and judicial law clerks. One of its attorneys is a former prosecutor, another is a start-up executive, another is a former corporate manager, and yet another has handled mergers, acquisitions, corporate finance, and other large-scale transactions with Fortune 100 companies.

### **Notable Cases**

The Murphy Firm has had extraordinary success in jury verdicts and in settlements in numerous high-profile, complex civil cases. Of note:

***Freddie Gray, Jr. v. Caesar R. Goodson, Jr., et al.*** (2015) (Circuit Court for Baltimore City). Obtained a \$6.4 million pre-suit settlement for the family and estate of Freddie Gray, Jr. for federal and state civil rights violations that led to plaintiff's death.

***Fallows, et al. v. St. Joseph Medical Center, Inc.*** (2014) (Circuit Court for Baltimore City, Maryland). Obtained \$50 million in settlements for individuals and lead counsel for Plaintiffs and a certified class action with St. Joseph's Medical Center, Inc. on behalf of patients that had unnecessary cardiac stents placed by Dr. Mark Midei.



*Do Right's Plant Growers, et al. v. RSM Equico, Inc., et al.* (2011) (Superior Court for Orange County, California). As settlement counsel for Defendant, successfully negotiated a \$37.5 million class action settlement

*Wynn et al. v. MJ Harbor Hotel, LLL, et al.* (2010) (Circuit Court for Baltimore City). The Murphy Firm won a \$34,333,000 verdict on behalf of 29 injured restaurant workers poisoned by carbon monoxide.

*Queen v. Constellation Power Source Generation, Inc.* (2009) (Circuit Court for Baltimore City). As lead plaintiffs' counsel, reached a \$55 million class action settlement with Constellation Energy on behalf of homeowners whose groundwater had been contaminated by coal ash.

*Billieson, et al. v. Scottsdale Ins. and Hous. Auth. of New Orleans* (2007) (Civil District Court for the Parish of Orleans, Louisiana). Defended a \$5 billion class action brought against defendants by 2,400 children injured by lead paint, settled for \$55 million.

*Mosley v. Bryan Keshaw* (2006) (Circuit Court for Baltimore City). Obtained a \$44,300,000 verdict in for an individual who was rendered a quadriplegic after a battery by a Baltimore City Police officer.

*People of the State of New York, by the Attorney General v. H&R Block, Inc., et al.* (2006) (Supreme Court of New York City, New York). Defended H&R Block in *parens patriae* action brought by the Attorney General of the State of New York for fraudulent and deceptive practices.

*In re H&R Block, Inc., Express IRA Marketing Litigation* (2006) (United States District Court, Western District of Missouri). Defended H&R Block in national class action based on excessive fees charged to consumers.



***Diaz v. Johnson & Johnson*** (2003) (United States District Court, Eastern District of Louisiana). As lead trial Counsel, successfully defended Johnson & Johnson in the first trial of a multi-thousand case MDL proceeding in the United States District Court in New Orleans concerning the drug Propulsid.

***H&R Block Refund Anticipation Loan Litigation*** (2003) (Nationwide) National coordinating counsel for H&R Block in Refund Anticipation Loan litigation nationwide, including two national class actions and four state-class actions. Successfully litigated and resolved all cases which included millions of class members.

- ***Lynn Kohan, et al. v. H&R Block, Inc.*** (2006) (Superior Court for the District of Columbia) Defended a District-wide action;
- ***Lynne A. Carnegie, et al. v. H&R Block, Inc., et al.*** (2003) (United States District Court, Northern District of Illinois). Defended and settled H&R Block in nationwide class action alleging violations of the Truth in Lending Act and the Racketeer Influenced and Corrupt Organizations Act;
- ***Cummins, et al. v. H&R Block, Inc., et al.*** (2003) (Circuit Court of Kanawha County, West Virginia) Defended and settled nationwide class action based on H&R Block's Refund Anticipation Loan product;
- ***Green, et al. v. H&R Block, Inc., et al.*** (2000) (United States District Court, District of Maryland). Defended and settled statewide class action based on H&R Block's Refund Anticipation Loan product.

***McNulty, et al. v. H&R Block, Inc., et al.*** (2002) (Court of Common Pleas of Lackawanna County, Commonwealth of Pennsylvania) Defended and settled a statewide class action based on electronic filing fees charged to consumers.



*Steele Software Systems v. First Union National Bank* (2002) (Circuit Court for Baltimore City). ). With co-counsel Snyder, Slutkin & Kopek won a \$276 million verdict against a major national bank, which included the largest punitive damage award in Maryland history at that time.

*Jackson, et al. v. Microsoft, and Donaldson, et al. v. Microsoft* (2001) (United States District Court, Western District of Washington). Along with Paul Hastings, LLP, successfully defended the Microsoft Corporation in two \$5 billion race discrimination class action cases brought separately by Willie Gary and Johnny Cochran, respectively, resulting in the dismissal of the class allegations in the first case and denial of class certification in the second case.

*Devan v. Ernst & Young* (2002) (Circuit Court for Baltimore City). With co-counsel Snyder, Weiner & Weltcheck negotiated a \$185 million settlement against Ernst & Young, the largest single-defendant settlement in Maryland history at the time.

*Mike Tyson v. Don King Productions, et al.* (2000) (United States District Court, Southern District of New York). Defense counsel for Don King Productions.

*United States of America v. Don King, et al.* (1998) (United States District Court, Southern District of New York). Along with co-counsel Curtis, Mallet-Prevost Colt & Mosle, obtained acquittals for Don King and Don King Productions after a four-month jury trial on mail and wire-fraud charges.